

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION**

<b>ROBERT MOORE</b>	§	
<b>Plaintiff,</b>	§	
	§	
<b>v.</b>	§	<b>EP-19-CV-00279-DCG</b>
	§	
<b>U.S. IMMIGRATION AND CUSTOMS</b>	§	
<b>ENFORCEMENT; U.S. CUSTOMS AND</b>	§	
<b>BORDER PROTECTION; AND</b>	§	
<b>U.S. DEPARTMENT OF HEALTH</b>	§	
<b>AND HUMAN SERVICES,</b>	§	
<b>Defendants.</b>	§	

**JOINT REPORT ON ALTERNATIVE DISPUTE RESOLUTION**

**TO THE HONORABLE UNITED STATES DISTRICT JUDGE:**

COMES NOW, Plaintiff Robert Moore, by and through his attorney of record, and Defendants United States Immigration and Customs Enforcement (“ICE”), United States Customs and Border Protection (“CBP”), and United States Department of Health and Human Services (“HHS”) (collectively referred hereinafter as “Defendants”), by and through the United States Attorney for the Western District of Texas, (hereafter the “Parties”) and file this Joint Report on Alternative Dispute Resolution (“ADR”) in compliance with the Court’s Scheduling Order and Local Rule CV-88, and would show the Court the following:

1. Status of settlement negotiations: The parties have negotiated and presented the Court with their proposed production schedule for Defendants release of responsive records to Plaintiff’s Freedom of Information Act (“FOIA”) requests. Compliance with the proposed scheduling order is likely to resolve or narrow the issues in the instant case.

2. The persons responsible for settlement negotiations: Assistant United States Attorney Manuel Romero for the Defendants, and Christopher Benoit and Lynn Coyle, Attorneys for Plaintiff.

3. Method of ADR and provider: The parties do not believe ADR is appropriate in this case at this time.

Submitted this 17th day of January, 2020.

Respectfully submitted,

**JOHN F. BASH**  
UNITED STATES ATTORNEY

/s/ Manuel Romero  
**MANUEL ROMERO**  
Assistant United States Attorney  
Texas State Bar No. 24041817  
700 E. San Antonio, Ste. 200  
El Paso, Texas 79901  
Office: (915) 534-6884  
Facsimile: (915) 534-3490  
Email: [Manuel.Romero@usdoj.gov](mailto:Manuel.Romero@usdoj.gov)  
*Attorneys for Defendants*

**AND**

/s/ Christopher Benoit  
**CHRISTOPHER BENOIT**  
Texas State Bar No. 24068653  
[chris@coylefirm.com](mailto:chris@coylefirm.com)  
**LYNN COYLE**  
Texas State Bar No. 24050049  
[lynn@coylefirm.com](mailto:lynn@coylefirm.com)  
The Law Office of Lynn Coyle, PLLC  
2515 N. Stanton Street  
El Paso, Texas 79902  
Telephone: (915) 532-5544  
Facsimile: (915) 532-5566  
*Attorneys for Plaintiff*